UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
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SAKUNTHALA THALAHITIYA
VITHANALAGE

         Plaintiff,

v.   Civ. Action No.: 3:22-cv-06248 (KMW/SAK)

ALIA AL HUNAITY   **DECLARATION OF**
and IMAD QATARNEH   **DAVID A. KOTLER**

         Defendants.
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I, David A. Kotler, declare as follows:

1.   I am an attorney admitted to practice before this Court and a partner at Dechert LLP, counsel for Plaintiff Sakunthala Thalahitiya Vithanalage ("Plaintiff"), in connection with the above-captioned action.

2.   I submit this Declaration in support of the Motion of Plaintiff Sakunthala Thalahitiya Vithanalage to Compel the Production of Testimony and Documents ("Motion to Compel").

3.   Defendant Imad Qatarneh consented to the submission of the Motion to Compel.

4.   Attached hereto as Exhibit A is a copy of the February 7, 2024 *Touhy* Request from Plaintiff to the Office of the General Counsel, U.S. Department of Homeland Security.

5.   Attached hereto as Exhibit B is a copy of the March 4, 2024 letter from the Office of the Principal Legal Advisor, Newark, U.S. Immigration and Customs Enforcement.

6.   Attached hereto as Exhibit C is an excerpt of Volume 2 of the trial transcript in *United States v. Al-Hunaity*, No. 1:18-CR-00723-RBK-1, containing the testimony of DHS Special Agent Bradley Benwell on April 30, 2019.

7.   Attached hereto as Exhibit D is an excerpt of Volume 3 of the trial transcript in

United States v. Al-Hunaity, No. 1:18-CR-00723-RBK-1, containing the testimony of DHS Special

Agent Bradley Benwell on May 1, 2019.

8.   Attached hereto as Exhibit E is an excerpt of Volume 5 of the trial transcript in

United States v. Al-Hunaity, No. 1:18-CR-00723-RBK-1, containing the testimony of DHS Special

Agent Ronald Conyers on May 3, 2019.

I certify under penalty of perjury that the foregoing is true and correct.

Executed in New York, New York.

Dated: June 25, 2024   Respectfully submitted,
     New York, New York

                                         By: */s/ David A. Kotler*
                                       David A. Kotler